REMARKS

Claims 16 to 21, 24 to 28, 34, and 35 are pending and being considered in the present application, since claims 1 to 15, 22, 23 and 29 to 33 were previously canceled. No new matter has been added. In view of the foregoing amendments and the following remarks, Applicants respectfully submit that all of the presently pending claims are allowable, and reconsideration of the present application is respectfully requested.

Applicants thank the Examiner for considering the Information Disclosure Statement and PTO-SB/08 paper filed July 22, 2009, and the cited references.

With respect to the rejection of claim 28 under 35 U.S.C. § 112, Applicants do not agree with the merits of the rejection because a diskette is an example of a transportable storage medium. Therefore, the features of the claim may be met by a diskette or any other transportable storage medium. In this regard, the claim, as previously presented, required the reading from <u>at least one of</u> the transportable storage medium and the diskette, which meant that an item could meet <u>one or both</u> of those criteria to meet the requirements of the claim. For example, a diskette would meet both those requirements, while other storage media would meet only one those requirements, i.e., the transportable storage medium feature and not the diskette feature.

Moreover, claim 28, as originally presented explicitly, referred to a transportable storage medium, and only referred to a diskette as one particular of the broader transportable storage medium, thereby providing adequate written description for the recited feature.

Nevertheless, to facilitate matters, claim 28 has been amended herein without prejudice to obviate the rejection and refer only to "transportable storage medium," of which the Office Action acknowledges a diskette is an example, and the reference to a diskette has been deleted to remove any perceived redundancy.

Withdrawal of the rejection is therefore respectfully requested.

Claims 20, 21, 24, 25 to 28, 34 and 35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicants' Admitted Prior Art ("AAPA") in view of U.S. Patent No. 6,680,919 ("Rauhala") and U.S. Patent No. 6,571,173 ("Joshi").

The Examiner agrees that AAPA and Rauhala fail to disclose the following features of claim 24, and asserts that Joshi provides the missing features:

> (a) For decoding, a point set of equidistant points of the linear object and of objects of a traffic route network is formed.

> (b) For a plurality of relative positions of the point sets in relation to each other, the number of points which lie within a predetermined spacing of at least one point of the other point set is determined for one of the point sets.

> (c) The object to be decoded is decoded in the relative position in which the number is greatest by outputting the part of the traffic route network then correlated with the object.

Joshi refers to a technique in which two space curves are compared by: (i) creating a set of tangent vectors in the first space curve; (ii) creating a corresponding set of tangent vectors in the second space curve; and (iii) calculating a Spatial Angle Variation Coefficient (SAVC) as a function of the angle between the projection of the tangent vector onto the x-y plane and the x-axis (angle θ), and as a function of the angle between the projection and the x-y plane (angle ϕ).

As to feature (a), the tangent vectors are merely formed at equal lengths L along each curve and do not constitute equidistant points, as is clearly illustrated in the figures. Moreover, the vector locations are incidental to the forming of the vectors and are not used in decoding. Further, as explained below in connection with the remaining features (b) and (c), the vector locations do not constitute a *point set* according to claim 24.

As to feature (b), the SAVC is calculated as a mean squared error between points that represent differences between the angles θ and ϕ at corresponding locations of the space curves (col. 6, lines 9 to 16). In this regard, SAVC calculation involves determining differences between *angles*. In contrast, claim 24 provides for a *determination of the number of points which lie within a predetermined spacing* (**i.e., within a predetermined distance**) *of at least one point of the other point set.* Further, the "points" ($d\theta$, $d\phi$) representing each angle difference are <u>not the same points</u> as the vector locations. As shown in Fig. 5, the points ($d\theta$, $d\phi$) are drawn as a scatter plot, separate from the graph of the space curves in Fig.

2. Thus, to the extent that the Examiner considers the points ($d\theta$, $d\phi$) to constitute a point set, it is respectfully submitted that the points ($d\theta$, $d\phi$) cannot disclose the points of claim 24 at least because (a) they are not *equidistant* in accordance with feature (a), and (b) the *spacing* between the points ($d\theta$, $d\phi$) is not relevant to any calculations performed in connection with the SAVC, which is inconsistent with feature (b).

In addition, to the extent that the Examiner considers the vector locations to constitute a point set, it is noted that the vector locations are not used in connection with the SAVC calculation. Therefore, as touched upon above, the vector locations do not constitute a point set according to feature (b). Accordingly, it is respectfully submitted that Joshi does not disclose point sets, which are defined in accordance with both features (a) and (b).

As to feature (c), Joshi does not teach determining the number of points lying within a predetermined spacing, for the reasons explained above. Since Joshi fails to disclose determining the number of points, Joshi cannot possibly disclose *decoding in the relative position in which the number is greatest*.

Accordingly, the combination of AAPA, Rauhala and Joshi does not disclose or suggest all of the features of claim 24 so that the combination does not render obvious claim 24 or any of its dependent claims, e.g., claims 20, 21 and 25.

Claim 26 provides for the same features (a), (b) and (c) discussed above in reference to claim 24. Accordingly, claim 26 and dependent claims 27, 28, 34 and 35 are allowable for at least essentially the same reasons given above for the patentability of claim 24.

Withdrawal of this obviousness rejection of claims 20, 21, 24, 25 to 28, 34 and 35 is therefore respectfully requested.

Claims 16 to 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over AAPA in view of Rauhala, Joshi and U.S. Patent App. Pub. No. 2003/0083809 ("Hatano"). Claim 19 was rejected under 35 U.S.C. § 103(a) as being unpatentable over AAPA in view of Rauhala, Joshi and U.S. Patent No. 7,243,355 ("Espino").

Claims 16 to 19 ultimately depend from claim 24 and are therefore allowable for at least the same reasons set forth above in support of the patentability of claim 24, since Hatano and Espino do not cure the deficiencies of AAPA, Rauhala and Joshi noted above in support of the patentability of claim 24.

Withdrawal of these obviousness rejections of claims 16 to 19 is therefore respectfully requested.

CONCLUSION

In light of the foregoing, it is respectfully submitted that all of the presently pending claims are in condition for allowance. Prompt reconsideration and allowance of the present application are therefore earnestly solicited.

Respectfully submitted,

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